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September 30, 2019

*VIA EMAIL*

Kathryn Cerise  
US EPA Region 10  
1200 Sixth Avenue, Suite 155  
ECL Mail Code 122  
Seattle, WA 98101  
Email: [Cerise.Kathryn@epa.gov](mailto:Cerise.Kathryn@epa.gov)

Re: Quendall Terminals Superfund Site  
Request for 30-Day Extension of Comment Period on Proposed Plan

Dear Ms. Cerise:

On behalf of BNSF Railway Company, I am requesting a 30-day extension of the comment period on the Proposed Plans for the Quendall Terminal Superfund Site.

Issuance of the Proposed Plans for the Quendall Terminal Site represents a major milestone for a Superfund mega-site that has been under study and evaluation for decades. As EPA has acknowledged in the Proposed Plans, fact sheet and at the public hearing, the plan for the uplands includes a novel technology that was not included in the Feasibility Study. The total cost of the remedy for the entire site, including both the upland and in-water operable units, has also increased substantially since issuance of the Feasibility Study. As discussed by multiple commenters at the public hearing, the increased remedy cost poses significant risks to the potential for redevelopment of the site.

Issuance of Proposed Plans provides a critical opportunity for the public and the potentially responsible parties to evaluate and weigh in on the tentative remedy for a site before EPA's issuance of the Record of Decision. Given the complexities and challenges presented by the Quendall Terminals Site, and the years that have gone into studying it, EPA should not rush the public comment process. In order to fully evaluate the Proposed Plans, including the novel technology selected for the uplands, additional time is required for the

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comment period. We therefore respectfully request that EPA extend the public comment period by 30 days, and we look forward to your timely response.

Sincerely,

TUPPER MACK WELLS PLLC



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cc: quendallcomments@epa.gov  
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Jim Benedict, counsel for Baxter  
Jason Foust, counsel for DNR  
Lynn Manolopoulos, counsel for Alitino  
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